

SEALED

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

JUL 24 2014

**IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION
JULY 2014 SESSION**

JULIA C. DUDLEY, CLERK
BY: 

UNITED STATES OF AMERICA	:	Case No.: 6:14-CR-000	<u>15</u>
	:		
v.	:		
	:	SEALED	
EDWARD DENNIS JONES	:	INDICTMENT	
BRYCE LEWIS CARTER	:		
CARLOS DEMETRICE JACKSON	:	<u>Violations:</u>	
JEROID MONTEZS MATTHEWS	:		
TONY SYLVESTER MONROE	:	21 U.S.C. § 846	
TYRONE EDWIN LEWIS	:	21 U.S.C. § 841(a)(1)	
LATEEF YUSEF JONES	:	18 U.S.C. § 922(g)(3)	
RANDALL AARON FALWELL	:		
	:		

COUNT ONE

The Grand Jury charges that:

1. Beginning in or about September 1998, and continuing to on or about August 2012, in the Western District of Virginia, and elsewhere, the defendants, EDWARD DENNIS JONES, BRYCE LEWIS CARTER, CARLOS DEMETRICE JACKSON, JEROID MONTEZS MATTHEWS, TONY SYLVESTER MONROE, TYRONE EDWIN LEWIS, LATEEF YUSEF JONES and RANDALL AARON FALWELL, did knowingly combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to possess with intent to distribute and to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. As to EDWARD DENNIS JONES, BRYCE LEWIS CARTER and CARLOS DEMETRICE JACKSON, one of the objects of the conspiracy was to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

3. As to TYRONE EDWIN LEWIS, one of the objects of the conspiracy was to distribute and possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine.

4. All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A), (b)(1)(B), and (b)(1)(C).

COUNT TWO

The Grand Jury further charges that:

1. On or about March 9, 2010, in the Western District of Virginia and elsewhere, the defendants, EDWARD DENNIS JONES and JEROID MONTEZS MATTHEWS, did knowingly and intentionally distribute or possess with intent to distribute, or did aid and abet in the distribution or possession with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THREE

The Grand Jury further charges that:

1. On or about April 6, 2010, in the Western District of Virginia and elsewhere, the defendants, EDWARD DENNIS JONES and JEROID MONTEZS MATTHEWS, did

knowingly and intentionally distribute or possess with intent to distribute, or did aid and abet in the distribution or possession with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOUR

The Grand Jury further charges that:

1. On or about April 24, 2012, in the Western District of Virginia and elsewhere, the defendant EDWARD DENNIS JONES, did knowingly and intentionally distribute or possess with intent to distribute, or did aid and abet in the distribution or possession with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIVE

The Grand Jury further charges that:

1. On or about June 20, 2012, in the Western District of Virginia and elsewhere, the defendant BRYCE LEWIS CARTER, did knowingly and intentionally distribute or possess with intent to distribute, or did aid and abet in the distribution or possession with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SIX

The Grand Jury further charges that:

1. On or about June 20, 2012, in the Western District of Virginia and elsewhere, the defendant LATEEF YUSEF JONES, did knowingly and intentionally attempt to distribute or possess with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 846 and 841 (b)(1)(C).

COUNT SEVEN

The Grand Jury further charges that:

1. On or about August 22, 2012, in the Western District of Virginia and elsewhere, the defendant EDWARD DENNIS JONES, then being an unlawful user of a controlled substance, as defined in 21 United States Code, Section 802, did knowingly possess a firearm, to wit: a Glock 36 .45 caliber, serial number DUL634, which had been shipped or transported in interstate or foreign commerce;

2. All in violation of Title 18, United States Code, Section 922(g)(3).

FORFEITURE NOTICE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment defendants shall forfeit to the United States pursuant to 21 U.S.C. § 853, and 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c):

- (a) any property constituting or derived from, any proceeds the defendant(s) obtained, directly or indirectly as a result of such violation.
- (b) any of the property of the defendant(s) that was used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.
- (c) any firearms and ammunition involved in the commission of the offense, or possessed in violation thereof.

2. The property to be forfeited to the United States includes but is not limited to the following property:

(a) **Money Judgment**

Not less than \$5,000,000.00 in United States currency and all interest and proceeds traceable thereto, for which the defendants are jointly and severally liable, in that such sum in aggregate was obtained directly or indirectly as a result of the aforestated offense or is traceable to such property.

(b) **Currency**

- 1) The sum of \$2,000.00 in United States currency seized from the residence of defendant EDWARD DENNIS JONES, 14175 Forest Road, Forest, Virginia, on August 22, 2012.
- 2) The sum of \$3,147.00 in United States currency seized from the residence of defendant BRYCE LEWIS CARTER, 4902 Sycamore Place, Lynchburg, Virginia on June 20, 2012.

(c) **Property**

- 1) An Emerson 40" Flat Screen television seized from the residence of defendant BRYCE LEWIS CARTER, 4902 Sycamore Place, Lynchburg, Virginia on June 20, 2012.

- 2) A Toshiba 40" Flat Screen television seized from the residence of defendant BRYCE LEWIS CARTER, 4902 Sycamore Place, Lynchburg, Virginia on June 20, 2012.
- 3) A Toshiba 65" Flat Screen television seized from the residence of defendant BRYCE LEWIS CARTER, 4902 Sycamore Place, Lynchburg, Virginia on June 20, 2012.

(d) **Firearm(s)**

- 1) Glock 36, 45 caliber, serial number DUL634 and any related ammunition.


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property and including but not limited the property described above in paragraph 2.

A True Bill this 24th day of July, 2014.


FOREPERSON


TIMOTHY L. HEAPHY
UNITED STATES ATTORNEY